

KO Investigation

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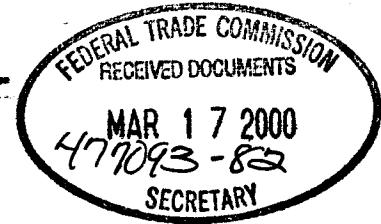
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ORIGINAL



March 13, 2000

Secretary,
Federal Trade commission
Room H-159 600 Pennsylvania Avenue NW
Washington, D.C. 20580

RE: Gramm-Leach - Bliley Act Privacy Rule
16 CFR Part 313 - comment

To Whom It may Concern,

I am writing to express my concern with the proposed regulations to implement Title V of the Gramm-Leach-Bliley Act of 1999. As a licensed private investigator and small business person, I fear we would lose a valuable and necessary source of locating witnesses and suspects if "non-public personal information" is defined to include simple names and addresses of customers of financial institutions.

It was my impression that the clear intent of Congress was to provide an opportunity for customers of financial institutions to "opt out" of sharing their personal financial information with non-affiliates of the institutions. The statute provides protection for financial information. If all information available to a financial institution is defined as "non-public personal information" then what is "public"? Congress seemed to be offering a distinction by describing financial information. I believe the Act provides opt-out of information regarding credit history, employment, and financial assets. But name, address and phone number should not be classified as "non-public."

Private investigators play an important role in our civil and criminal justice systems which is not understood by many. The information we obtain regarding addresses and phone numbers is essential to our conduct of business. We utilize this information to investigate embezzlement, insurance fraud, locate delinquent child support debtors and serve process among other things. current address information is essential.

If this information is deemed "non-public personal," only wrongdoers and criminals will benefit and the law-abiding consumer will be the loser. We urge you to define non-public personal information in the manner that congress intended.

Sincerely,

William D. Koehnlein